



Marjorie L. Hauf, Esq.  
Nevada Bar No.: 8111  
Matthew G. Pfau, Esq.  
Nevada Bar No.: 11439  
H&P LAW  
710 S. 9<sup>th</sup> Street  
Las Vegas, NV 89101  
702 598 4529 TEL  
702 598 3626 FAX  
mhauf@courtroomproven.com  
mpfau@courtroomproven.com  
Attorneys for Plaintiffs,  
*Elaine Braxton and D.N.*

UNITED STATES DISTRICT COURT  
CLARK COUNTY, NEVADA

\* \* \*

**Elaine Braxton**, individually and as  
natural parent and guardian of **D.N.**,  
a minor,

Plaintiff,

vs.

**Clark County School District**; a  
Political Subdivision of the State of  
Nevada, **Jesus F. Jara**, in his  
individual and official capacity; **Kody  
Barto**, in his individual and official  
capacity; **Gayle Orvedal**, in her  
individual and official capacity;  
**Michelle Brown**, in her individual  
and official capacity; DOES I through  
X; and ROE CORPORATIONS I through  
X, inclusive,

Defendants.

Case No.: 2:23-00144-JAD-BNW

**Stipulation and [Proposed] Order to  
Extend Discovery**

**(1st Request)**

**IT IS HEREBY STIPULATED AND AGREED** by and between the parties hereto, by  
and through their respective counsel of record, that the discovery deadlines in this  
case be extended by sixty (60) days as follows:

**I.****DISCOVERY COMPLETED**

Defendants provided their Initial List Witness and Document Disclosure Pursuant to FRCP 26(a)(1) on April 6, 2023.

Plaintiff provided her Initial Witness and Document Disclosure Pursuant to FRCP 26(a)(1) on April 14, 2023.

**II.****DISCOVERY THAT REMAINS TO BE COMPLETED**

1. Written discovery;
2. Depositions of the parties;
3. Depositions of percipient witnesses;
4. Initial and rebuttal expert disclosures;
5. Depositions of expert witnesses; and
6. Any additional discovery that may arise.

**III.****GOOD CAUSE EXISTS FOR THE REQUESTED EXTENSION**

On April 20, 2023, Plaintiffs filed their first Amended Complaint. After discussions with Defense counsel, Plaintiffs agreed to further changes to the Complaint, and on May 10, 2023, Plaintiffs filed a Second Amended Complaint. On May 31, 2023, Defendants filed their Answer to Plaintiff's Second Amended Complaint.

With the resulting delay of the Amended Complaints and time taken for Defendants to prepare an Answer, discovery has fast approached. Currently, expert disclosures are due on July 21, 2023. This does not provide enough time to retain and prepare experts, along with further discovery preparation. Based on the fact that neither Plaintiffs nor Defendants have served any discovery thus far, there is good cause to extend deadlines sixty (60) days.

While the parties have been diligent in progressing this case, discovery is in the very beginning stages, as the Answer has just recently been filed. As such, additional time is needed to propound written discovery and take depositions prior to the retention and disclosure of expert witnesses. The parties therefore request a 60 day extension of the discovery deadlines.

#### IV.

#### PROPOSED SCHEDULE FOR COMPLETING DISCOVERY:

The parties have agreed to extend all of the discovery deadlines in this case by sixty (60) days, as set forth below:

	CURRENT DEADLINE	PROPOSED DEADLINE
Close of discovery	September 19, 2023	November 20, 2023
Amend pleadings/add parties	July 21, 2023	September 19, 2023
Plaintiff's and Defendants' Experts disclosures	July 21, 2023	September 19, 2023
Rebuttal expert disclosures	August 21, 2023	October 20, 2023
Dispositive motions	October 19, 2023	December 18, 2023
Pre-Trial Order	November 20, 2023, or, if dispositive motions are filed, 30 days from the entry of the court's ruling on the motions.	January 19, 2024, or, if dispositive motions are filed, 30 days from the entry of the court's ruling on the motions.



Pretrial Disclosures or Objections to the Pretrial Order	January 19, 2024, or 30 days after the filing of the joint pretrial order	February 19, 2024, or 30 days after the filing of the joint pretrial order
--	--	---

Dated this \_\_\_\_ day of June, 2023.

H&P Law

Greenberg Traurig, LLP

*/s/ Marjorie Hauf*

*/s/ Kara Hendricks*

Marjorie Hauf, Esq.  
Nevada Bar No. 8111  
Attorneys for Plaintiffs

Kara Hendricks, Esq.  
Nevada Bar No. 07743  
Attorney for Defendants

### **ORDER**

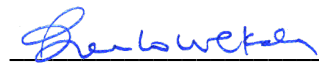
IT IS SO ORDERED that the discovery deadlines in this matter are extended as follows:

	<b>NEW DEADLINE</b>
Close of discovery	November 20, 2023
Amend pleadings/add parties	September 19, 2023
Plaintiff's and Defendants' Experts disclosures	September 19, 2023
Rebuttal expert disclosures	October 20, 2023
Dispositive motions	December 18, 2023
Pre-Trial Order	January 19, 2024, or, if dispositive motions are filed, 30 days from the entry of the

	court's ruling on the motions.
Pretrial Disclosures or Objections to the Pretrial Order	February 19, 2024, or 30 days after the filing of the joint pretrial order

**IT IS SO ORDERED.**

DATED: June 5, 2023



DISTRICT COURT JUDGE